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May 24, 2022

VIA ECF

The Honorable John G. Koeltl
United States District Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, New York 10007

*The June 1, 2022 Conference
is canceled.
so ordered.*

Re: *Garcia v. W Services Group LLC, et al.*
Case No.: 22-CV-1959 (JGK)(BCM)

Jr 6/1/22
U.S.D.C.
5/24/22

Your Honor:

As counsel to Defendant W Services Group LLC ("Defendant" or "W Services"), we write pursuant to Rule I(E) of your Honor's Individual Rules to request an adjournment of the June 1, 2022, conference scheduled for 12:30 p.m. in connection with Defendant's anticipated motion to dismiss (Dkt. No. 43). This is the first request for an adjournment of this conference, and all parties consent to the adjournment.

On Friday, May 20, 2022, the parties filed a joint motion to stay the case so that they can discuss potential resolution. With Defendant's deadline to respond to the Complaint looming (on Monday, May 23, 2022), Defendant filed the pre-motion letter in connection with a motion to dismiss out of an abundance of caution in case Magistrate Judge Moses did not grant the application for a stay. Thankfully, Magistrate Judge Moses did indeed grant the application to stay the case quickly. Accordingly, to afford the parties an opportunity to discuss global resolution, Defendant respectfully requests an adjournment of the June 1st conference before Your Honor to a date after July 5, 2022. In the event the parties successfully resolve all disputes and the case globally by that date, it would obviate the need for all currently pending disputes before the Court.

Counsel remains available should Your Honor require additional information regarding this submission.

Respectfully submitted,

JACKSON LEWIS P.C.

Timothy Domanick

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TD/mf

cc: All counsel of record (via ECF)